

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
	:	
-vs-	:	No. 3:23-CR-127
	:	
THOMAS TROTTA,	:	(Judge Mannion)
	:	
Defendant	:	

MOTION FOR EXTENSION OF TIME
FOR SELF-SURRENDER

AND NOW comes the Defendant, Thomas Trotta, by and through his attorney Joseph R. D'Andrea, Esq., hereby motions this Honorable Court to extend the time for self-surrender and avers as follows:

1. On May 22, 2023, the United States Attorney for the Middle District of Pennsylvania filed a felony Information, charging Defendant Thomas TROTTA with one violation of 18 U.S.C. §§668 and 2, Theft of Major Artwork, Aid and Abet;

2. The Defendant plead guilty before the Honorable Malachy Mannion on July 5, 2023;

3. Due to certain circumstances, the Defendant was required to self-surrender on May 24, 2024;

4. Because of continued serious medical issues, including two surgeries and hospitalizations, the Defendant requested extensions of time to self-surrender;

5. An Order dated May 24, 2024, by the Honorable Joseph Saporito granted the Defendant's request to delay his self-surrender due to his medical condition until May 31, 2024.

6. The Defendant's medical problems continue to worsen and the infection in his leg is spreading;

7. Attached are copies of letters from Dr. Janet Erickson and Dr. Brian Cable dated May 29, 2024, regarding his present medical condition;

8. The letter from Dr. Brian Cable indicates that he has the Defendant scheduled for surgery Friday morning, May 31, 2024;

9. This upcoming surgery is the third surgery that Mr. Trotta has needed in an attempt to stop the serious infection that exists in a large, gaping, leg wound;

10. The Defendant's medical condition is significant and is in need of immediate surgical attention and aftercare;

11. The surgeon has indicated in the attached letter that this surgery will also include an in-patient period of hospitalization to monitor the infection;

12. It is unknown how long that Mr. Trotta's hospitalization will may take;

WHEREFORE, due to the urgency of the impending surgery, the Defendant hereby honorably requests that this self-surrender be extended for a period of fourteen (14) days.

Respectfully submitted,

Date: May 30, 2024

/s/ Joseph R. D'Andrea
JOSEPH R. D'ANDREA, Esq
Attorney for Thomas Trotta

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THOMAS TROTTA,	:	
Defendant.	:	

CERTIFICATE OF SERVICE

I, Joseph R. D'Andrea, do hereby certify that this document, the foregoing Motion, have been electronically serviced via e-mail, including the following:

James M. Buchanan, Esq.
Assistant United States Attorney
U.S. Attorney's Office, Middle District of Pennsylvania
235 N. Washington Avenue, Suite 311
Scranton, PA 18503
James.Buchannan@usdoj.gov

And by placing the same in the United States mail, first class, postage prepaid, at Scranton, Pennsylvania, addressed to the following:

Thomas Trotta

Joseph R. D'Andrea
JOSEPH R. D'ANDREA, ESQ.
Attorney for Thomas Trotta

Date: May 30, 2024

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CERTIFICATE OF NONCONCURRENCE

I, Joseph R. D'Andrea, Counsel for the Defendant, contacted the Assistant United States Attorney, James Buchanan, to discuss the foregoing Motion wherein he indicated that the Government does not concur in the same at this time.

Date: May 30, 2024

Joseph R. D'Andrea
JOSEPH R. D'ANDREA, ESQ.
Attorney for Thomas Trotta

LVPG INTERNAL MEDICINE-STEAMTOWN
300 LACKAWANNA AVE
STE 200
SCRANTON PA 18503-2001
Phone 570-342-7864
Fax 570-614-2039

May 29, 2024

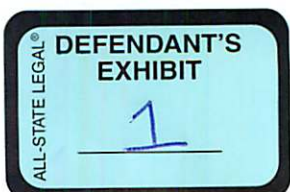
To Whom it May Concern:

Thomas Trotta, DOB 6/6/1975; is currently under my medical care. Thomas currently has a wound vac on his left thigh for drainage. Due to his current medical condition, Thomas will need monitoring and wound care on a consistent basis. Incarceration would be detrimental to Thomas's health and well being if he were to not have the ability to have this wound monitored and treated properly.

Sincerely,



Janet E Erickson, MD



LVPG ORTHOPEDICS AND SPORTS MEDICINE - MONTROSE
100 HOSPITAL DR
MONTROSE PA 18801-6402
Phone 570-307-1767
Fax 570-307-1770

May 29, 2024

RE: Thomas Trotta
DOB: 6/6/1975

To Whom it May Concern:

Thomas Trotta is currently under my care. Scheduled for surgical intervention on 5/31/24. Will be admitted as an inpatient for further care following surgery.

If you have any questions or concerns, please don't hesitate to call.

Sincerely,

Brian M Cable, MD

